

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2018-8-E

In the Matter of:)	
)	
Duke Energy Progress, LLC's)	PETITION TO INTERVENE
Integrated Resource Plan (IRP))	
)	
)	

The South Carolina Coastal Conservation League (“CCL”), Southern Alliance for Clean Energy (“SACE”), and Upstate Forever (collectively, “Petitioners”), through counsel, hereby petition the Public Service Commission of South Carolina (“Commission”), pursuant to R. 103-825 of the Commission’s rules, to intervene in the above-captioned docket. In support of this petition, Petitioners state as follows:

1. Duke Energy Progress, LLC (“DEP”) is an investor-owned utility that is regulated by the Commission. S.C. Code Ann. § 58-3-140 (2010). The Commission regulates and supervises DEP as to, among other things, its rates, services, facilities, and practices. *Id.*; *see also* R. 103-810 of S.C. Code of Regs. (citing S.C. Code Ann., §§ 58-27-10 *et seq.*). DEP’s rates, services, facilities, and practices are relevant to, and in part a function of, the development of its Integrated Resource Plan (“IRP”).

2. DEP must prepare IRPs, submit them to the State Energy Office every three years and update them on an annual basis, and file the plans with the Commission pursuant to the requirements established by the Commission. *See* S.C. Code Ann. §§ 58-37-10 and 58-37-40 (2010) and Commission Order Nos. 1998-502 and 2010-124.

3. IRP filings in the Commission must contain a 15-year demand and energy forecast; the utility's program for meeting its forecast requirements in an economic and reliable manner, including both demand-side and supply-side options; a brief description and summary of cost-benefit analysis, if available, of each option considered, including those not selected; and the supplier's or producer's assumptions and conclusions with respect to the plan's effect on the cost and reliability of energy service, and a description of the external, environmental and economic consequences of the plan to the extent practicable. Commission Order No. 1998-502; *see also* S.C. Code Ann. § 58-37-10 (2010).

4. In Order No. 2012-26, the Commission declared that "the Commission's integrated resource planning process [constitutes] a proceeding under Section 103-804(Q) of our regulations, into which intervention is permitted." In rendering this decision, the Commission noted that "[t]he IRP process is an important planning tool for the Companies and the Commission," and that "a transparent and open process in this regard allows for increased sharing of information and ideas, which is valuable to all interested parties." Commission Order No. 2012-26. The Commission indicated that in future IRP dockets, intervention requests would be considered by the Commission.

5. On November 1, 2018, DEP filed its 2018 IRP, which was entered in the above-captioned docket.

6. Petitioners seek to intervene in this docket to advocate for integrated resource planning that evaluates resource alternatives and results in a low-cost, reliable portfolio of supply- and demand-side resources with minimal harmful environmental impacts and costs to ratepayers.

7. CCL is a nonprofit corporation organized under the laws of the State of South Carolina. The principal address of CCL is P.O. Box 1765, Charleston, South Carolina 29402. As an advocate for conservation and energy efficiency, CCL supports development of energy policy that is in the public interest of South Carolinians. CCL has members in South Carolina who receive electricity service from DEP and who would be subject to the impacts of DEP's integrated resource planning, which influences decision-making about supply- and demand-side resources utilized and impacts the cost of electricity.

8. SACE is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe, and healthy communities throughout the Southeast. The principal address of SACE is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina, and South Carolina. SACE and its members have an interest in promoting greater reliance on clean, low-cost energy, and have an interest in DEP's IRP. SACE has members in South Carolina who receive electricity service from DEP and who would be subject to the impacts of DEP's integrated resource planning, including resource selection and the cost of electricity.

9. Upstate Forever is a non-profit, membership-based organization existing under the laws of the State of South Carolina. The principal address of Upstate Forever is 507 Pettigru Street, Greenville, South Carolina 29601. Upstate Forever promotes sensible growth and the protection of special places in the Upstate region of South Carolina. Upstate Forever has members who receive electric service from DEP and are

subject to the impacts of the utility's resource planning process and subsequent decision-making.

10. The provision of reliable and economical electricity, and all decisions related thereto, impact Petitioners and their members. A utility's IRP and the resource mix contained therein impacts the cost of electricity to customers. Moreover, the manner in which DEP conducts its integrated resource planning, and whether it does so in a fiscally and environmentally responsible manner, is directly relevant to the purpose of Petitioners' organizations. Accordingly, Petitioners and their members have a direct interest in this proceeding.

11. Petitioners propose to provide their position on the IRP through written comments and may also request an ex parte briefing before the Commission.

12. Petitioners are represented by the following counsel in this proceeding:

Stinson Woodward Ferguson
Southern Environmental Law Center
463 King Street, Suite B
Charleston, SC 29403
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WHEREFORE, Petitioners pray that they be allowed to intervene in this matter.

Respectfully submitted this 8th day of November, 2018.

s/ Stinson W. Ferguson
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Attorney for Petitioners

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Duke Energy Progress, LLC's)	CERTIFICATE OF SERVICE
Integrated Resource Plan (IRP))	
)	
)	

I certify that the following persons have been served with one (1) copy of Petition to Intervene by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

<p>Heather S. Smith Duke Energy Progress, LLC 40 West Broad, Suite 690 Greenville, SC 29601 Heather.smith@duke-energy.com</p> <p>Frank R. Ellerbee, III Sowell Gray Robinson Stepp Laffitte, LLC P.O. Box 11449 Columbia, SC 29211 fellerbe@sowellgray.com</p>	<p>Jeffrey M. Nelson Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201 jnelson@regstaff.sc.gov</p> <p>Rebecca J. Dulin Duke Energy Progress, LLC 1201 Main Street, Suite 1180 Columbia, SC 29201 Rebecca.Dulin@duke-energy.com</p> <p>Samuel J. Wellborn Robinson Gray Stepp & Laffitte, LLC P.O. Box 11449 Columbia, SC 29211 swellborn@sowellgray.com</p>
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This the 8th day of November, 2018

s/ A. Rachel Pruzin